

**BEFORE THE
PUBLIC SERVICE COMMISSION OF WISCONSIN**

Joint Application of American Transmission)	
Company LLC and Dairyland Power Cooperative,)	
for Authority to Construct and Operate a New)	
345kV Transmission Line from the Existing)	Docket No. 5-CE-146
Hickory Creek Substation in Dubuque County,)	
Iowa to the Existing Cardinal Substation in Dane)	
County, Wisconsin, to be known as the)	
Cardinal-Hickory Creek Project)	

**CLEAN GRID ALLIANCE, FRESH ENERGY, AND MINNESOTA CENTER FOR
ENVIRONMENTAL ADVOCACY'S REQUEST TO INTERVENE AND NOTICE OF
APPEARANCE**

REQUEST TO INTERVENE

Pursuant to Wis. Stat. § 227.44(2m) and Wis. Admin. Code § PSC 2.21, Clean Grid Alliance (“CGA”), Fresh Energy, and Minnesota Center for Environmental Advocacy (“MCEA”), collectively Clean Energy Organizations (“CEOs”), hereby request leave to intervene with full-party status in the above-captioned docket. CEOs intend to participate jointly in the proceeding.

For the reasons stated below, the Public Service Commission (“the Commission”) should grant CEOs’ intervention request because CEOs satisfy the standards for intervention by right and permissive intervention.

I. THE COMMISSION SHOULD GRANT CEOS INTERVENTION BY RIGHT

The standard for intervention by right in a Commission proceeding requires an intervenor to demonstrate they have a substantial interest that may be affected in the proceeding. Wis. Admin. Code § PSC 2.21(1). CEOs satisfy this standard for the reasons outlined below.

A. Clean Grid Alliance

CGA is a non-profit 501(c)(3) organization that works to overcome the barriers to bringing renewable energy to market in the Midwest. CGA achieves its mission through technical transmission work, active participation in state and federal regulatory cases, policy advocacy, and education and outreach efforts. CGA is actively engaged in renewable energy and transmission issues across the Midcontinent Independent System Operator (“MISO”) footprint and has participated in multiple transmission line cases in Minnesota, Wisconsin, and Illinois.

Founded in 2001, CGA is a collaboration between renewable energy advocacy organizations and renewable energy developers and manufacturers. The CGA footprint covers nine (9) states in the Midwest, including Minnesota, Wisconsin, and Iowa. CGA's more than forty (40) members include wind, solar, and energy storage developers and manufacturers; non-profit environmental, public interest, and clean energy advocacy organizations; farmer organizations; and other businesses that support renewable energy. Many of CGA's members are developers whose renewable energy projects literally depend upon the outcome of the Cardinal-Hickory Creek transmission line ("the Project"). CGA's members clearly have a substantial interest in this matter and will be highly affected by decisions made by the Commission in this docket as these decisions will determine the future viability of many member projects.

B. Fresh Energy

Fresh Energy is a non-profit 501(c)(3) organization whose mission is to provide clean energy policy solutions, advocacy, expertise, and analysis. Fresh Energy's programs include the Renewable Electricity Program which facilitates the adoption of renewable energy by eliminating barriers and enhancing clean energy infrastructure. Fresh Energy has a long history of advancing clean energy transmission in the Midwest by working in highly technical planning forums as well as with community groups engaged in siting and routing issues on the ground. Fresh Energy's members are Minnesotans who understand that the effects of greenhouse gas emissions are not limited by state boundaries, and therefore seek to foster the development of renewable energy resources not just in Minnesota, but across the Midwest.

Fresh Energy's members recognize that this Project will provide much needed grid infrastructure, thereby enabling substantial additions of renewable energy projects to the grid. The clean-energy projects made possible by this transmission line will not only be constructed in Wisconsin and Iowa, but also in Minnesota and across the Midwest. The Project will also improve grid reliability and reduce current grid congestion on a regional basis, benefitting Minnesotans and other Midwestern states. Fresh Energy's members will directly benefit from the improved reliability, reduced congestion, and additional renewable energy resources this Project will enable, causing Fresh Energy's members to have a substantial interest in this project that will be affected by the decisions made in this proceeding.

C. Minnesota Center For Environmental Advocacy

MCEA is a non-profit 501(c)(3) environmental organization that works in the courts, legislature, and state agencies to protect Minnesota's wildlife, natural resources, and the health of its people. One of MCEA's key program areas is its Climate and Energy Program which is comprised of initiatives that support Minnesota's transition away from coal-fired power to clean energy.

MCEA's members support these initiatives and have a substantial interest in reducing greenhouse gas emissions as deeply and as rapidly as possible to protect their individual health and the health of their living environment. This Project will facilitate carbon-free energy generation by creating the necessary infrastructure to bring more renewable resources online both in Minnesota and across this Midwest. This will reduce greenhouse gas emissions on a

regional level, directly benefitting MCEA's members who are affected by emissions that do not abide by state boundaries. Because MCEA's members have a substantial interest in reducing regional greenhouse gas emissions generally, and in reducing harmful emissions from coal-fired electricity generation specifically, they will be affected by the decisions made in this docket.

D. Summary Of Collective Substantial Interest And Effect

Consistent with their respective missions, CEOs regularly participate in resource planning, evaluation, and acquisition matters before various state utility commissions with an interest in advancing resource choices that foster renewables or eliminate pollutant emissions. While the Cardinal-Hickory Creek line will connect Iowa to Wisconsin, the clean-energy benefits of the Project will extend beyond these states to the entire Midwest region, including Minnesota.

Specifically, the Project will improve electric system reliability both locally and for the Midwest region. The Project will also reduce grid congestion, benefitting Minnesota and its energy consumers. Most importantly, the Project will expand necessary clean-energy infrastructure, enabling greater usage of renewables across the Midwest. The Project is also a necessary component of CEOs' members' renewable energy projects, the viability of which literally depends upon the approval of the Project.

While CEOs' members will benefit from the Project, CEOs are also environmental organizations, and as such, their members have an interest in ensuring this Project has the least environmental impact possible. To that end, CEOs have an interest in ensuring this Project is built in a way that balances the benefits of renewable energy with any resulting environmental impacts from the physical location of the Project.

In sum, members of CEOs have substantial interests which will be affected by the Commission's actions regarding the approval and routing of this Project.

II. IN THE ALTERNATIVE, THE COMMISSION SHOULD GRANT CEOS PERMISSIVE INTERVENTION

The standard for permissive intervention provides that a person who does not satisfy the criteria for intervention by right may nevertheless intervene in a matter if they will likely promote the proper disposition of the issues in the proceeding and will not impede the timely completion of the proceeding. Wis. Admin. Code § PSC 2.21(2).

CEOs satisfy the standard for permissive intervention. Specifically, CEOs will promote proper disposition of the issues by working with all parties and providing a unique perspective which will assist the Commission in properly determining the Project's ability to 1) enable new renewable energy projects, 2) enable the construction of renewable energy projects that have already been approved, 3) enable achievement of renewable energy standards and greenhouse gas reduction goals, 4) impact regional greenhouse gas emissions, 5) impact regional grid reliability, and 6) impact regional grid congestion.

CEOs will also not impede the timely completion of this matter. While the schedule for this case has yet to be set, CEOs will comply with all deadlines in this proceeding.

Because CEOs will promote the proper disposition of the issues and will not impede the timely completion of the proceeding, CEOs meet the standard for permissive intervention and their request to intervene in this matter should be granted.

III. CONCLUSION

Clean Grid Alliance, Fresh Energy, and Minnesota Center for Environmental Advocacy (collectively “CEOs”) request that they be granted leave to intervene in the above-captioned proceeding and granted the full powers and rights afforded to a party in this matter. CEOs satisfy both the standard for intervention by right and permissive intervention and therefore request they be allowed to intervene by right, or in the alternative, by permission.

NOTICE OF APPEARANCE

Petitioners (CEOs) hereby provide notice that Amelia J. Vohs of Minnesota Center for Environmental Advocacy and Sean R. Brady of Clean Grid Alliance will represent CEOs in this proceeding. In addition, CEOs agree to accept service by electronic means and request that the following persons be placed on the Commission’s Official Service List for this docket. CEOs also request that all further documents and correspondence in this proceeding be served on:

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Respectfully submitted,

/s/ Amelia J. Vohs

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Dated this 20th day of November, 2018.